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*Attorneys for Participating Claimants listed on
Exhibit A annexed hereto*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION

CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

DECLARATION OF HELEN DAVIS CHAITMAN

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Chaitman LLP, counsel to the BLMIS participating claimants listed on Exhibit A (“Participating Claimants”). I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in connection with the Participating Claimants' memorandum of law in opposition to the Trustee's motion seeking affirmance of histreatment of profit withdrawals.

3. Annexed hereto as **Exhibit B** is the index of exhibits to my declaration which, to the best of my knowledge, contains true and correct copies of the documents attached hereto.

I declare under penalty of perjury that the foregoing is true and correct.

September 23, 2016

/s/ Helen Davis Chaitman _____

Helen Davis Chaitman

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2016, I caused a true and correct copy of the foregoing document to be served upon the parties in this action who receive electronic service through CM/ECF and by electronic mail upon:

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Substantively Consolidated SIPA Liquidation
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LLC and the Estate of Bernard L. Madoff*

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